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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

RACHAEL AGUIRRE HUIZAR,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-00744-EFB

STIPULATION AND ~~PROPOSED~~ ORDER  
FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 45 days, from July 11, 2025 to August 25, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions and organizational changes, counsel for the

Commissioner has been tasked with additional duties and handling more cases, including the instant case, which was recently reassigned to her. She also serves as jurisdictional coordinator, which requires providing guidance and advice on litigation matters, and such duties are unpredictable, arise on an on-call basis, and are often time sensitive. The undersigned was also out of the office for over a week at the end of June into early July. For these reasons, despite diligent efforts to manage her workload, counsel for the Commissioner needs additional time in the instant case to review the substantial administrative record, consider the multiple issues Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: July 3, 2025

LAW OFFICES OF FRANCESCO BENAVIDES

By: /s/ Francesco Benavides\*

FRANCESCO BENAVIDES

Attorneys for Plaintiff

[\*As authorized by e-mail on July 3, 2025]

Dated: July 3, 2025

MICHELE BECKWITH

Acting United States Attorney

MATHEW W. PILE

Associate General Counsel

Office of Program Litigation, Office 7

By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

### **ORDER**

Pursuant to the parties' stipulation, IT IS ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on August 25, 2025 and Plaintiff's reply, if any, shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

DATED: July 17, 2025

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE